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 7 *Debtor In Possession*

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 12 *Acting United States Trustee*

13 **UNITED STATES BANKRUPTCY COURT**  
 14 **SOUTHERN DISTRICT OF CALIFORNIA**

15 In re

16 BORREGO COMMUNITY HEALTH  
 17 FOUNDATION, a California nonprofit  
 public benefit corporation,

18 Debtor and Debtor in Possession.

Case No. 22-02384-11

Chapter 11 Case

**STIPULATION BETWEEN THE  
 DEBTOR AND THE UNITED  
 STATES TRUSTEE TO EXTEND  
 DEADLINE TO FILE REPLIES**

20 Borrego Community Health Foundation, the debtor and debtor in possession in  
 21 the above-captioned case (the “Debtor”) and Tiffany L. Carroll, the Acting United  
 22 States Trustee for Region 15 (the “UST” and collectively with the Debtor, the  
 23 “Parties”), hereby agree and stipulate as follows:

24 **RECITALS**

25 WHEREAS, on September 12, 2022, the Debtor filed a voluntary petition for  
 26 relief under chapter 11 of title 11 of the United States Code (the “Bankruptcy Code”)  
 27 commencing the above referenced bankruptcy case (the “Bankruptcy Case”) in the  
 28

1 United States Bankruptcy Court for the Southern District of California (the “Court”);

2 WHEREAS, on December 6, 2022, the Debtor filed *Debtor’s Motion for an*  
3 *Order Authorizing the Debtor to Retain and Compensate Professionals Utilized by*  
4 *the Debtor in the Ordinary Course of Business; Memorandum of Points and*  
5 *Authorities in Support Thereof* [Docket No. 271] (the “OCP Motion”).

6 WHEREAS, on December 7, 2022, the Debtor filed the *Debtor’s Motion for*  
7 *Entry of Order: Authorizing (I) Key Employee Retention Program and (II) Key*  
8 *Employee Incentive Program; Memorandum of Points and Authorities in Support*  
9 *Thereof* [Docket No. 279] (the “KEIP/KERP Motion,” collectively with the OCP  
10 Motion, the “Motions”);

11 WHEREAS, the Motions are both set for hearing on January 18, 2023, at 2:00  
12 p.m.;

13 WHEREAS, on December 21, 2022, the UST filed (i) its objection to the  
14 KEIP/KERP Motion [Docket No. 324] and (ii) its objection to the OCP Motion  
15 [Docket No. 325] (collectively, the “Objections”);

16 WHEREAS, pursuant to the Court’s local rules (the “Local Rules”), the current  
17 deadline for Debtor to file its replies in support of the Motions is December 28, 2023;

18 WHEREAS, the Debtor requested extension of time to file its replies to January  
19 6, 2023 in light of the holidays in December 2022 and January 2023;

20 WHEREAS, in light of the foregoing, the Parties have jointly agreed to extend  
21 the deadline for Debtor to file its replies in support of the Motions.

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**STIPULATION**

**NOW THEREFORE**, subject to approval of the Court, the Parties hereby agree and stipulate as follows:

1. The deadline for the Debtor to file replies in support of the Motions will be extended to January 6, 2023.

2. No other deadlines shall be affected by this stipulation unless further agreed to by the Parties.

**IT IS SO STIPULATED.**

SEEN AND AGREED:

Dated: December 23, 2022

DENTONS US LLP  
SAMUEL R. MAIZEL  
TANIA M. MOYRON

By /s/ Tania M. Moyron  
Tania M. Moyron

Attorneys for the Chapter 11 Debtor and  
Debtor In Possession

AND

Dated: December 23, 2022

OFFICE OF THE UNITED STATES  
TRUSTEE  
HAEJI HONG  
TRIAL ATTORNEY

By: /s/Haeji Hong  
Haeji Hong, Trial Attorney for  
Tiffany L. Carroll, the Acting  
United States Trustee for Region  
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**(Proposed Order)**

**CSD 1001A** [07/01/18]

Name, Address, Telephone No. &amp; I.D. No.

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**UNITED STATES BANKRUPTCY COURT**

SOUTHERN DISTRICT OF CALIFORNIA

325 West F Street, San Diego, California 92101-6991

In Re

BORREGO COMMUNITY HEALTH FOUNDATION

Debtor and Debtor in Possession

Debtor.

BANKRUPTCY NO. 22-02384-11

Date of Hearing:

Time of Hearing:

Name of Judge:

**ORDER ON  
STIPULATION BETWEEN THE DEBTOR AND THE UNITED STATES TRUSTEE TO EXTEND DEADLINE  
TO FILE REPLIES**

The court orders as set forth on the continuation pages attached and numbered   2   through   2   with exhibits, if any, for a total of   2   pages. Motion/Application Docket Entry No. \_\_\_\_\_.

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DATED:

\_\_\_\_\_  
Judge, United States Bankruptcy Court

**CSD 1001A** [07/01/18](Page 2)

ORDER ON STIPULATION BETWEEN THE DEBTOR AND THE UNITED STATES TRUSTEE TO EXTEND DEADLINE TO FILE REPLIES

DEBTOR: BORREGO COMMUNITY HEALTH FOUNDATION

CASE NO: 22-02384-11

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Debtor and Debtor in Possession

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The Court having considered the Stipulation Between the Borrego Community Health Foundation (the "Debtor") and Tiffany L. Carroll, the Acting United States Trustee for Region 15 (the "UST") to Extend Deadline to File Replies (the "Stipulation" [Docket No. \_] filed by the Debtor and records in this case; the Court having found that good and sufficient cause exists for granting the Stipulation;

IT IS HEREBY ORDERED that:

1. The Stipulation is granted.

IT IS SO ORDERED.